

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	<u>ECF CASE</u>
IN RE AMERICAN INTERNATIONAL	:	
GROUP, INC. SECURITIES LITIGATION	:	Master File No. 04 Civ. 8141 (DAB) (AJP)
	:	
This Document Relates To: All Actions	:	<u>Oral Argument Requested</u>
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**NOTICE OF LEAD PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS SETTLEMENT WITH
AMERICAN INTERNATIONAL GROUP, INC.**

PLEASE TAKE NOTICE that the Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio and the Ohio Police & Fire Pension Fund (collectively, "Lead Plaintiff" or the "Ohio State Funds"), through counsel, will move on a date convenient for the Court, before the Honorable Deborah A. Batts, at the U.S. Courthouse, 500 Pearl Street, New York, NY 10007, for an order pursuant to Federal Rule of Civil Procedure 23(e) for: (i) preliminary approval of a proposed class action settlement with Defendant American International Group, Inc.; (ii) preliminary certification of a settlement class for settlement purposes only pursuant to Rule 23(a) and (b)(3); (iii) appointment of the Ohio State Funds as Class Representatives and Lead Counsel Labaton Sucharow LLP and Hahn Loeser & Parks LLP as Class Counsel; (iv) approval of the form, substance and requirements of the proposed notice and the means and methods for disseminating notice as comporting with due process and the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. §§ 78u-4 *et seq.*; and (v) such other and further relief as the Court deems just and proper. Defendants will not oppose the motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiff submits and is submitting herewith: Lead Plaintiff's Memorandum of Law in Support of its

Motion for Preliminary Approval of Class Settlement with American International Group, Inc.; the accompanying Declaration of Thomas A. Dubbs in Support of Lead Plaintiff's Motion for Preliminary Approval of Class Settlement with American International Group, Inc. with annexed exhibits; the Agreement of Compromise and Settlement with annexed exhibits; and a proposed Preliminary Approval Order with annexed exhibits.

Dated: November 30, 2010

Respectfully submitted,

**RICHARD CORDRAY,
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